

2010 APR 27 PM 4:19  
CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

FILED

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

February 2010 Grand Jury

CR 10 00416

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
JOAN MARIE BOUCHER, )  
 )  
Defendant. )

CR 10-  
I N D I C T M E N T  
[29 U.S.C. § 501(c):  
Embezzlement and Theft of  
Labor Union Assets]

The Grand Jury charges:

COUNTS ONE THROUGH SIX

[29 U.S.C. § 501(c)]

1. At all times relevant to this Indictment, Local 399 Staff Union was a "labor organization," as defined in Title 29, United States Code, Section 402(i), that engaged in an industry affecting commerce.

2. On or about the following dates, in Los Angeles County, within the Central District of California, and elsewhere, defendant JOAN MARIE BOUCHER, while an employee and officer of Local 399 Staff Union, namely, Treasurer, knowingly embezzled and

BSK

1 stole, and unlawfully and willfully abstracted and converted to  
 2 her own use, and the use of others, the following moneys, funds,  
 3 property, and other assets of Local 399 Staff Union:

<u>COUNT</u>	<u>CHECK DATE</u>	<u>DEPOSIT DATE</u>	<u>CHECK NUMBER</u>	<u>AMOUNT</u>
ONE	May 15, 2005	May 25, 2005	24862	\$1,995.00
TWO	July 13, 2005	July 26, 2005	24885	\$2,055.00
THREE	August 5, 2005	August 19, 2005	24893	\$2,195.00
FOUR	August 31, 2005	September 8, 2005	24897	\$1,910.00
FIVE	October 14, 2005	October 14, 2005	5474	\$1,800.00
SIX	November 10, 2005	December 12, 2005	6427	\$1,890.00

13 A TRUE BILL

14  
 15 /s/  
 16 Foreperson

17 ANDRÉ BIROTTE JR.  
 18 United States Attorney

19 *Daniel S. Goodman, Asst. U.S. Atty*  
 20 *Deputy Chief, Criminal Division, FOR.*

21 CHRISTINE C. EWELL  
 22 Assistant United States Attorney  
 23 Chief, Criminal Division

24 BEONG-SOO KIM  
 25 Assistant United States Attorney  
 26 Acting Chief, Major Frauds Section

27 JILL FEENEY  
 28 Assistant United States Attorney  
 Deputy Chief, Major Frauds Section

AARON M. MAY  
 Assistant United States Attorney  
 Major Frauds Section